

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re:) 20-01974
)
TIFFANY M. PERKINS,) Chapter 13
)
Debtor.) Hon. Judge Donald R. Cassling

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on October 19, 2023, at 9:30 a.m., I will appear before the Honorable Donald R. Cassling or any judge sitting in that judge's place, **either** in courtroom 619 of the Dirksen Federal Building, **or** electronically as described below, and present the Motion of Debtor, Tiffany M. Perkins, to Incur Debt, a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **161 414 7941** – the password is **619**. The meeting ID and further information can be found on Judge Cassling's web page on the court's website <https://www.ilnb.uscourts.gov/content/judge-donald-r-cassling>.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: Michael R. Colter, II
David M. Siegel & Assoc., LLC
790 Chaddick Drive
Wheeling, IL 60090
(847) 520-8100
mcolter@davidmsiegel.com

CERTIFICATE OF SERVICE

I, Michael R. Colter, II, certify that I served a copy of this notice and the attached motion on each entity shown below and on the attached list at the address shown and by the method indicated on the list on October 5, 2023, before 5:30 p.m.

/s/ Michael R. Colter, II
Attorney for Debtor(s)

To the following persons or entities who have been served via electronic mail:

Patrick S. Layng, U.S. Bankruptcy Trustee

Thomas H. Hooper, Chapter 13 Trustee

To the following persons or entities on the attached list who have been served via U.S. Mail:

Label Matrix for local noticing
0752-1
Case 20-01974
Northern District of Illinois
Eastern Division
Thu Oct 5 13:42:32 CDT 2023

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

AT&T Corp
% AT&T Services, Inc
Karen A. Cavagnaro - Lead Paralegal
One AT&T Way, Room 3A104
Bedminster, NJ 07921-2693

AT&T
Bankruptcy Department
5407 Andrew Highway
Midland, TX 79706-3615

Aarons Sales & Leasing
4428 W. North Ave
Chicago, IL 60639-4707

Ad Astra Recovery Serv
7330 W 33rd St N Ste 118
Wichita, KS 67205-9370

American InfoSource
PO Box 248848
Oklahoma City, OK 73124-8848

American InfoSource LP
PO Box 51178
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Chicago, IL 60639-3309

COMCAST
PO BOX 1931
Burlingame, CA 94011-1931

(p)CHICAGO DEPARTMENT OF LAW
ATTN BANKRUPTCY UNIT
121 N LASALLE ST SUITE 400
CHICAGO IL 60602-1264

Comcast
Bankruptcy Department
11621 E. Marginal Way 5
Tukwila, WA 98168-1965

Comcast
PO Box 3002
Southeastern, PA 19398-3002

Comenity Bank
Bankruptcy Department
PO Box 182125
Columbus, OH 43218-2125

Commonwealth Edison Company
Bankruptcy Department
1919 Swift Drive
Oak Brook, IL 60523-1502

Commonwealth Edison-Care Center
Bankruptcy Department
PO Box 87522
Chicago, IL 60680-0522

Credit Management Lp
4200 International Pkwy
Carrollton, TX 75007-1912

Credit One
Bankruptcy Department
PO Box 98873
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Credit Protection Asso
13355 Noel Rd Ste 2100
Dallas, TX 75240-6837

(p)DIRECTV LLC
ATTN BANKRUPTCIES
PO BOX 6550
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Diversified Consultant
10550 Deerwood Park Blvd
Jacksonville, FL 32256-0596

FINGERHUT/WEBBANK
6250 Ridgewood Rd.
Saint Cloud, MN 56303-0820

Fingerhut
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Saint Cloud, MN 56395-1250

IC Systems
444 Highway 96 East
Saint Paul, MN 55127-2557

IDES
Bankruptcy Department
33 S State St.
Chicago, IL 60603-2804

IDES
Benefit Repayments
PO Box 4385
Chicago, IL 60680-4385

IRS
Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Illinois Department of Employment S
Benefit Payment Control
PO Box 4385
Chicago, IL 60680-4385

(p)ILLINOIS DEPARTMENT OF REVENUE
BANKRUPTCY UNIT
PO BOX 19035
SPRINGFIELD IL 62794-9035

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Lvnn Funding Llc
Po Box 10497
Greenville, SC 29603-0497

Midland Credit Management, Inc.
Bankruptcy Department
8875 Aero Drive, Ste 200
San Diego, CA 92123-2255

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Warren, MI 48090-2037

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Fishers, IN 46037-9203

Online Collections
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(p)PEOPLES GAS LIGHT & COKE COMPANY
200 EAST RANDOLPH ST
CHICAGO IL 60601-6433

Quantum3 Group
P.O. Box 788
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
MOMA Funding LLC
PO Box 788
Kirkland, WA 98083-0788

(p)ILLINOIS SECRETARY OF STATE
298 HOWLETT BUILDING
SPRINGFIELD IL 62756-0001

Secretary of State License Renewal*
17 N State
Suite 1100
Chicago, IL 60602-3561

Source Receivables Management
4615 Dundas Dr.
Greensboro, NC 27407-1650

Southwest Credit Syste
4120 International Parkway
Carrollton, TX 75007-1958

Speedy Cash
Bankruptcy Department
8400 E. 32nd Street N
Bel Aire, KS 67226-2608

Speedy Cash
Bankruptcy Department
PO Box 780408
Wichita, KS 67278-0408

(p)SPRINT
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4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

(p)T MOBILE
C O AMERICAN INFOSOURCE LP
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OKLAHOMA CITY OK 73118-7901

T Mobile/T-Mobile USA Inc
by American InfoSource as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118-7901

US Department of Education
Claims Filing Unit
PO Box 8973
Madison, WI 53708-8973

Us Dept Of Ed/glelsi
Po Box 7860
Madison, WI 53707-7860

Verizon
Bankruptcy Nat'l Recovery Dept
PO Box 26055
Minneapolis, MN 55426-0055

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Room 873
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Thomas H. Hooper
Office of the Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Suite 3850
Chicago, IL 60603-5764

Tiffany M Perkins
1016 N Ridgeway
Chicago, IL 60651-3815

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	20-01974
)	
TIFFANY M. PERKINS,)	Chapter 13
)	
Debtor.)	Hon. Judge Donald R. Cassling

MOTION TO INCUR DEBT

NOW COMES the Debtor, Tiffany M. Perkins, by and through her attorneys, David M. Siegel & Assoc., LLC, to present this Motion, and in support thereof states as follows:

- 1) This Court has jurisdiction under 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois.
- 2) On January 23, 2020, Debtor filed for relief under Chapter 13 of Title 11 USC.
- 3) Debtor's Plan was confirmed April 9, 2020, with monthly payments of \$175.00, and general unsecured creditors receiving no less than 10% of their allowed claims.
- 4) Debtor's plan payments are deducted from payroll.
- 5) Debtor can afford to make the proposed payments on this car as evidenced by her Amended Schedules I and J (Exhibit A).
- 6) This court previously entered an order on August 13, 2020, at docket 33 granting Debtor permission to finance the purchase of a 2017 GMC Acadia. Debtor did not purchase a vehicle with that order.
- 7) Debtor is currently driving a 2009 Ford Fusion which she purchased in August 2020, with her tax refund instead of financing the purchase of the 2017 GMC Acadia.
- 8) The 2009 Ford Fusion is not running well and Debtor does not believe it is in her financial best interest to continue spending money to maintain the vehicle.

- 9) Debtor seeks leave to finance the purchase of a 2021 Jeep Compass, or similar vehicle, for \$25,908.62, with a fixed interest rate of 19.55% with payments of \$600.92 per month for 74 months (Exhibit B).

WHEREFORE, the Debtor, Tiffany M. Perkins, prays this Honorable Court enters an Order Granting Debtor's Motion to Incur Debt and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Michael R. Colter, II

Michael R. Colter, II, A.R.D.C. #6304675

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